

May 16, 2022

VIA ECF

Hon. Jesse M. Furman
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: Bluestone Resources Inc. et al. v. Greensill Capital (UK) Limited et al., Case No. 21-CV-2253 (JMF)

Dear Judge Furman:

Plaintiffs and Defendants Alexander Greensill and Roland Hartley-Urquhart (the “Individual Defendants”), by and through their undersigned counsel, jointly hereby respectfully request that the stay in this action as to the Individual Defendants entered by order of the Court on September 9, 2021 (Dkt. 43) (the “Stay Order”) and extended by orders of the Court on December 9, 2021 (Dkt. 46) and March 11, 2022 (Dkt. No. 49) (together, the “Stay Extension Orders”) be extended for an additional 45 days.

As the Court is aware, pursuant to the Stay Order, all deadlines in this case were stayed as to the Individual Defendants following the recognition of Defendant Greensill Capital (UK) Limited’s (“GCUK”) administration proceeding under the United Kingdom’s Insolvency Act of 1986 as a foreign main proceeding pursuant to Chapter 15 of the Bankruptcy Code by the U.S. Bankruptcy Court for the Southern District of New York on September 10, 2021, including a stay of the deadline for the Individual Defendants to answer or otherwise respond to the Complaint until December 20, 2021, which deadline was extended by the Stay Extension Orders until May 20, 2022. As the parties noted in their prior joint requests for extensions of the stay, GCUK’s Chapter 15 case remains pending. In addition, discussions between and among various parties in interest to this action as to a potential resolution of this action have substantially progressed since the parties’ last joint extension request, and the requested extension of the stay would allow for those constructive discussions to continue. Therefore, Plaintiffs and the Individual Defendants submit that an extension of the stay as to the Individual Defendants would serve judicial efficiency.

Accordingly, Plaintiffs and the Individual Defendants respectfully request that all deadlines in this case remain stayed as the Individual Defendants for an additional 45 days, including extension of the following deadlines:

	<u>Current Deadline</u>	<u>New Deadline</u>
Individual Defendants to answer or move to dismiss the Amended Complaint:	May 20, 2022	July 6, 2022
Plaintiffs to oppose any motion to dismiss filed by Individual Defendants:	July 19, 2022	September 2, 2022
Individual Defendants to file replies in support of motions to dismiss:	August 9, 2022	September 23, 2022

Plaintiffs and the Individual Defendants also request that the initial pretrial conference remain adjourned *sine die* as provided in the Stay Order.

Respectfully submitted,

/s/ James L. Bromley

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cc: Laura R. Hall (by ECF)